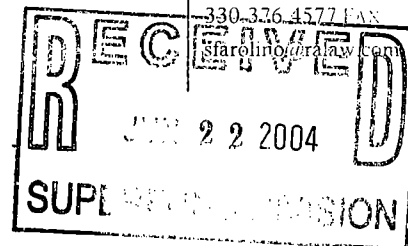




222 SOUTH MAIN STREET
AKRON, OH 44308
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sfarolino@ralaw.com



June 16, 2004

VIA FACSIMILE (312-886-6064) AND REGULAR MAIL

Ms. Marsha A. Adams
U.S. Environmental Protection Agency
Remedial Enforcement Support Section
77 West Jackson Blvd. (SR-6J)
Chicago, IL 60604-3590

US EPA RECORDS CENTER REGION 5



466690

Re: Studebaker Chemical
CRS Site - Response to General Notice of Potential Liability

Dear Ms. Adams:

On June 9, 2004, on behalf of one of this firm's clients, Studebaker Chemical ("Studebaker"), the undersigned received a General Notice of Potential Liability ("General Notice") from the United States Environmental Protection Agency ("U.S. EPA") regarding the Chemical Recovery Systems Site in Elyria, Ohio (the "CRS Site" or "Site"). This letter is written in order to comply with the mandate that Studebaker respond to the General Notice within ten (10) days of receipt of the same.

Simply stated, even before receiving the General Notice from U.S. EPA, Studebaker was aware that it was viewed by U.S. EPA as a potentially responsible party ("PRP") with respect to the Site. Specifically, according to information received from counsel for the CRS Site Group, records in U.S. EPA's files indicate that Studebaker may have sent approximately 5,349 gallons of waste to the Site. As I discussed with Assistant Regional Counsel Thomas Nash, Esq., assuming that Studebaker did, in fact, send the aforementioned amount of waste to the Site, the volume of waste in question falls below the de minimis settlement threshold in this matter.

As you are aware, the undersigned also received, on behalf of Studebaker, a CERCLA Section 104(e) Request for Information in this matter. Studebaker will be responding to the Request for Information within the time frame established by U.S. EPA. As I have indicated to Mr. Nash, to the extent that U.S. EPA reviews Studebaker's forthcoming response to the Section 104(e) Request for Information and extends a fair and equitable de minimis settlement offer to Studebaker, our client would certainly be willing to discuss with U.S. EPA the potential resolution of its alleged liability in this matter.

Ms. Marsha A. Adams
June 16, 2004
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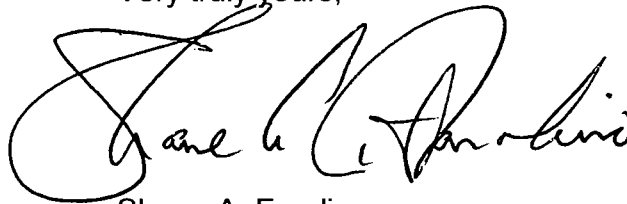
As stated above, the undersigned will be submitting Studebaker's response to U.S. EPA's CERCLA Section 104(e) Request for Information shortly. Thereafter, the undersigned will await receipt of a de minimis settlement offer from U.S. EPA in this matter.

I trust that this letter adequately responds to the General Notice which was recently received on behalf of our client. In the future, please direct all future correspondence and communications to Studebaker to the undersigned at the address and telephone number listed above.

Lastly, to the extent that U.S. EPA possesses information or records which suggest to the agency that Studebaker is a PRP under CERCLA with respect to the Site, please forward this information to me at your earliest convenience.

If you have any questions, or if I can be of additional assistance at this time, please do not hesitate to contact me directly.

Very truly yours,

A handwritten signature in black ink, appearing to read "Shane A. Farolino". The signature is fluid and cursive, with a large initial "S" and "F".

Shane A. Farolino

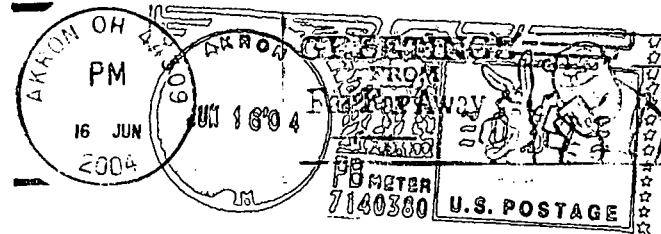
SAF/lko

cc: Susan Papushak
Thomas Nash, Esq.
Mark A. Ropchock, Esq.

ROETZEL & ANDRESS

A LEGAL PROFESSIONAL ASSOCIATION

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